



CALIFORNIA FAIR POLITICAL PRACTICES COMMISSION

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To: Chair Silver, Commissioners Brandt, Ortiz, Wilson, and Zettel

From: Chloe Hackert, Education & External Affairs Unit Manager

Subject: **Statement of Economic Interests (Form 700), new proposed Form 700-P disclosure of prospective employment, and Related Documents (Form 700 Reference Pamphlet, Form 700-A, Form 700-U, Form 700 Amendments, and Form 700 Frequently Asked Questions)**

Date: November 10, 2025

Executive Summary

Attached for your approval are the 2025/2026 Statement of Economic Interests Form 700, new proposed Form 700-P for the disclosure of prospective employment, Form 700 Reference Pamphlet, Form 700-A, Form 700-U, Form 700 Amendments, and Form 700 Frequently Asked Questions.

Updates to the Form 700 and related documents include changes to relevant dates and filing deadlines, as well as minor updates resulting from the implementation of last year's bill, [AB 1170](#), effective January 1, 2025. This bill requires certain filers under Section 87500(a) to file their Form 700 electronically with the Commission.

Additionally, the Form 700 and related documents have been updated to incorporate recent changes resulting from this year's legislation, including [AB 1286](#), requiring the disclosure of any arrangement for prospective employment by Section 87200 Filers, and [SB 852](#), adding public officials who manage public investments to the list of individuals for whom the Commission is the filing officer, effective January 1, 2026. All updates are highlighted in yellow.

Staff recommends specifying in which way Section 87200 Filers report any arrangement for prospective employment, and has identified two options for the Commission's consideration.

AB 1286 – Disclosure of Prospective Employment

AB 1286 requires public officials listed in Government Code Section 87200 to disclose on their Form 700 any arrangement for prospective employment. An "arrangement for prospective employment" is defined as "an agreement pursuant to which a prospective employer's offer of employment has been accepted by the prospective employee, including through verbal or written acceptance."

Section 87200 Filers are required to report the following: (1) the date that the filer accepted the prospective employer's offer of employment, (2) the business position, (3) a general description of the business activity of the prospective employer, and (4) the name and street address of the prospective employer.



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The requirement to disclose prospective employment does not apply to filers under Section 87300 (e.g., conflict of interest code filers, also known as “code filers”). This requirement only applies to Section 87200 Filers.

Option One – Form 700-P Attachment

The first option is that the newly required disclosure of prospective employment is completed on an attachment, the new Form 700-P, which is filed electronically via the FPPC’s electronic filing system at the same time as filing the regular Form 700.

With the passage of AB 1170 and SB 852, the FPPC is the filing officer for all Section 87200 Filers under the Act. Section 87200 Filers are required to electronically file their Form 700 using FPPC’s electronic filing system. Under this proposal, Section 87200 Filers will be prompted to complete the attachment Form 700-P to disclose any arrangement for prospective employment through FPPC’s e-filing system at the same time as filing their regular Form 700 (e.g., assuming office, annual, and leaving office statements).

Proposed Forms under Option One

- Option 1 – Draft Attachment Form 700-P 2025
- Option 1 – Draft Form 700 2025 – 700-P Attachment Cover Page
- Option 1 – Draft Amendments Form 700 2025 – 700-P Attachment Cover Page

Option Two – Disclosure of Prospective Employment on Schedule C

The second option is to complete the newly required disclosure of prospective employment on Schedule C of the Form 700. Schedule C is used to report income, loans, and business positions. Now, in addition to this reporting, Section 87200 Filers would disclose any arrangement for prospective employment on Schedule C. A date field has been added to Part 1 of Schedule C. Please note that the date field is only applicable to reporting any arrangement for prospective employment by Section 87200 Filers. Instructions for completing Schedule C have also been updated to include information on this reporting requirement for Section 87200 Filers.

Proposed Forms under Option Two

- Option 2 – Draft Form 700 2025 – Schedule C Version
- Option 2 – Draft Amendments Form 700 2025 – Schedule C Version

SB 852 – Form 700 E-Filers Adding Public Officials Who Manage Public Investments

SB 852 corrects an inadvertent omission from last year’s bill, AB 1170, requiring certain categories of filers to file their Form 700 electronically through the FPPC’s e-filing system. SB 852 adds public officials who manage public investments to the list of individuals for whom the Commission is the filing officer for Form 700s and requires those officials to file their Form 700s using the FPPC’s e-filing system.



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Public Comment

The attached documents were made available on the Commission's website in October for public review and comment.

We received one public comment from Jennifer Miskewycz of CalSTRS regarding a typo on the cover page of Option 1's Draft Form 700 2025 – 700-P Attachment Cover Page, which has been corrected. The same edit was made to Option 1's Draft Amendments Form 700 2025 – 700-P Attachment Cover Page. The edits have been highlighted in green. No other changes were made to the Form 700 and related documents in response to public comments.

CalSTRS also provided that their preference for the options presented would be Option 1. They stated that adding language to the existing form would cause confusion for non-87200 Filers as to whether they need to disclose any arrangement for prospective employment. Having a separate form, as with Option 1, alleviates those types of questions and inquiries.

We received feedback from Granicus, the Commission's electronic filing vendor, which expressed some concerns regarding Option 2, as the Form 700 Schedule C change will affect all filers in the FPPC's e-filing system and local agencies' electronic Form 700 filing systems. Since there will not be two different versions of Schedule C on the Form 700, the prospective employment disclosures will be exposed to all filers in all systems. However, most filers will not be required to report prospective employment as the law only applies to Section 87200 Filers. As with any change, this may raise numerous questions from filers and require additional support from vendors. Lastly, other vendors will also need to implement these changes to Schedule C.

Additionally, on November 4, 2025, Commission staff held an Interested Persons Meeting to solicit public comments regarding the implementation of changes resulting from AB 1286 and SB 852, to ensure an effective transition to mandatory e-filing for public officials who manage public investments, and to receive feedback on the two options for the new prospective employment disclosure requirements for Section 87200 Filers.

At the November 4, 2025, Interested Persons meeting, staff received comments and feedback from filing officers and the regulated community regarding the implementation of SB 852. These comments expressed a desire for clarification on which public officials qualify as those who manage public investments under Section 87200.

We received public comment from Don Garcia, Chief, Conflict/Lobbyist Division, of the Los Angeles County Board of Supervisors' Office regarding the instructions on reporting prospective employment, and that their office may consider requiring some of their filers to report prospective employment in the future. As a result, Option 2, which includes reporting prospective employment on Schedule C of the Form 700, might be beneficial to their office if they choose to adopt this requirement.

The FPPC's SEI Unit was present at the Interested Persons meeting and provided contact information and additional details regarding the implementation of SB 852. The FPPC has been engaging with external stakeholders regarding the changes resulting from AB 1289 and SB 852, as



well as implementing these changes through upcoming training opportunities and updated educational materials.

Conclusion

In response to the public comment, staff recommends Option 1 – Form 700-P attachment to disclose prospective employment for Section 87200 Filers. However, both options facilitate the reporting of prospective employment and can be implemented in either direction.

Attachments:

- Draft Form 700 FAQ's
- Draft Form 700-A
- Draft Form 700-U
- Draft Form 700 Reference Pamphlet
- Option 1 – Draft Attachment Form 700-P 2025
- Option 1 – Draft Form 700 2025 – 700-P Attachment Cover Page
- Option 1 – Draft Amendments Form 700 2025 – 700-P Attachment Cover Page
- Option 2 – Draft Form 700 2025 – Schedule C Version
- Option 2 – Draft Amendments Form 700 2025 – Schedule C Version